

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

IN RE:

**PARK FLETCHER REALTY, LLC,**

**Case No. 15-843-JJG-11**

Debtor.

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**SECOND MOTION TO EXTEND TIME TO FILE SCHEDULES, STATEMENT OF AFFAIRS AND RELATED INCOME AND EXPENSE SCHEDULE**

1. On the date hereof, Debtor was the Debtor in Possession in the captioned Bankruptcy proceeding, which was commenced by the filing of a Voluntary Petition under Chapter 11 of title 11 of the United States Code, (the “Bankruptcy Code”), on February 15, 2015 which generated the related Order for Relief herein, (the “Commencement Date”). Debtor continues to operate its business and manage its properties pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

2. Debtor is engaged in the business of owning and operating a portfolio consisting of 15 multi-tenant and 2 single tenant industrial flex and office-warehouse building containing a combined rentable area of 807,986 square feet situated on a non-contiguous 65.114 acre site, (the “Real Estate”).

**Jurisdiction**

3. This Court has jurisdiction to consider this matter pursuant to 28 USC §§ 157 and 1334. This is a core proceeding pursuant to 28 USC §§ 157 (b). Venue is proper before this Court pursuant to 28 USC §§ 1408 and 1409.

**Relief Requested**

4. By this Motion, Debtor requests that the Court extend the deadline for filing its schedules, statement of affairs and related schedule of income and expense for seven days from the date hereof. This case was filed in response to the appointment of a receiver in an emergency fashion and additional time is needed to accumulate and present the required documents. The Debtor has just filed its application to employ Richey Mills and Associates, LLC as financial advisor to the Debtor and said professional is working presently to build financial statements and otherwise assist the Debtor in preparing the schedules.

**WHEREFORE**, the Debtor respectfully requests that the Court grant an additional seven days to file its schedules, statement of affairs and related schedule of income and expense, and for all other relief just and proper

Respectfully Submitted,

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/s/ KC Cohen \_\_\_\_\_  
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March 17, 2015

**CERTIFICATE OF SERVICE**

The undersigned counsel hereby certifies that a copy of the foregoing was filed using the Court's ECF system and parties will be served via such system. In addition the following were served by email on the date indicated:

KC Cohen on behalf of Debtor Park Fletcher Realty, LLC  
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David A. Lerner on behalf of Creditor Filbert Orton EAT, LLC  
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Charles R. Wharton on behalf of U.S. Trustee U.S. Trustee  
Charles.R.Wharton@usdoj.gov

\_\_\_\_\_  
/s/ KC Cohen \_\_\_\_\_  
KC Cohen